

Docket-222

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

27 MAY 1993

IN REPLY REFER TO:

7330-7/1700A3

RECEIVED

MAY 28 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARYHonorable Larry LaRocco  
House of Representatives  
1117 Longworth Building  
Washington, D.C. 20515

Dear Congressman LaRocco:

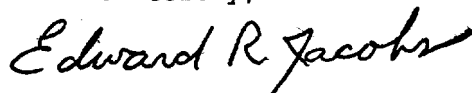
This is in reply to your letter of May 5, 1993 in which you inquired on behalf of your constituent, Vaugh Killeen, regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). This Notice proposes comprehensive changes to the Commission's Rules governing the private land mobile radio services operating in the frequency bands below 512 MHz.

The proposals in the Notice reflect to a large extent concepts and proposals submitted in the initial inquiry stages of this proceeding. None of the proposals set forth in the Notice, however, are engraved in stone. Indeed, the proposals represent our best judgment at this stage of the proceeding on steps that must be taken to improve the regulatory climate for users of the private land mobile radio spectrum below 512 MHz. I have enclosed for your information a copy of that part of the Notice that describes the numerous proposals, plus a discussion paper released March 1, 1993. In sum, the final rules will take the special needs of rural users into account.

We are sensitive to the needs of users of private land mobile radio spectrum and the impact that these proposals may have on their radio systems, including the costs of required modifications. Your constituent's letter will be included in the record of the proceeding and will be fully evaluated when we develop final rules.

We want to thank you for your interest in this proceeding. We expect to issue final rules in 1994.

Sincerely,

Edward R. Jacobs  
Deputy Chief, Land Mobile and  
Microwave Division

Enclosures

No. of Copies rec'd 2 copies  
List A B C D E

# Congressional

*DATE: 5-27-93*

PLEASE MAKE 2 EXTRA COPIES OF INCOMING, ATTACHMENTS,  
AND REPLY FOR DOCKET FILE, ROOM 222.

CONGRESSIONAL CORRESPONDENCE TRACKING SYSTEM  
05/20/93

## LETTER REPORT

CONTROL NO.	DATE RECEIVED	DATE OF CORRESP	DATE DUE	DATE DUE OLA(857)
9302111	05/20/93	05/05/92	06/08/93	

TITLE	MEMBERS NAME	REPLY FOR SIG OF
Congressman	Larry LaRocco	BC

CONSTITUENT'S NAME	SUBJECT
Vaugh Killeen	inq. comments on PR Docket 92-235

REF TO	REF TO	REF TO	REF TO
PRB/LW 5-20-93			
DATE	DATE	DATE	DATE
05/20/93			

REMARKS:

RECEIVED  
MAY 21 9 23 AM '93  
PRIVATE

LARRY LAROCCO

1ST DISTRICT, IDAHO

COMMITTEE ON NATURAL RESOURCES

COMMITTEE ON BANKING,  
FINANCE AND URBAN AFFAIRS

AT-LARGE WHIP



**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515**

May 5, 1993

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WASHINGTON, DC 20515-1201  
(202) 225-6611

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BOISE, ID 83702  
(208) 343-4211

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P.O. BOX 67  
CALDWELL, ID 83606  
(208) 459-2362

621 MAIN STREET  
LEWISTON, ID 83501  
(208) 746-6694

408 SHERMAN AVENUE  
COEUR D'ALENE, ID 83814  
(208) 667-2110

Mr. James H. Quello  
Acting Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Chairman Quello:

I am writing to express my concerns about PR Docket 92-235. As indicated in the enclosed letter from the Ada County Sheriff's Office in Boise, Idaho, this proposed rule ignores the unique characteristics of rural areas. It would require local governments to invest hundreds of thousands of dollars for a problem States like Idaho do not yet have.

In rural areas, the proposed FCC rule will render emergency radio equipment obsolete and will force the costly construction of additional transmitters. I believe an exemption of rural areas from this costly and unnecessary mandate should be considered.

Although I understand that the current system will eventually need modifications, local governments should be given adequate time to modify existing systems. Therefore, I request

# ADA COUNTY SHERIFF'S OFFICE

BOISE, IDAHO



VAUGHN KILLEEN, Sheriff

7200 BARRISTER DRIVE  
BOISE, IDAHO 83704-9217

TELEPHONE (208) 377-8500  
ADMINISTRATION FAX (208) 377-6535  
POLICE RECORDS FAX (208) 377-6578

February 19, 1993

Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

RE: PR DOCKET NO. 92-235

Dear Sir:

I have reviewed your PR Docket No. 92-235, Notice of Proposed Rule Making, dated November 6, 1992, and I consider this proposed rule change another federal mandate that will have a harsh impact on local government. I have also reviewed a letter sent to you in reply to PR docket No. 92-235 written by the Associated Public Safety Communications Officers, Inc., dated January 12, 1993.

This letter was in opposition to your proposed removal of Part 90 and installation of a new Part 88 of the FCC rules. APCO is the largest representative voice for all public safety communications for the United States and Canada. APCO has been serving public safety since 1935.

I am in complete agreement with APCO's assessment of the "refarming issue." Additionally, I would like to voice my concerns regarding other matters relating to this subject.

The Ada County Sheriff's Office manages a consolidated dispatch center for the public safety providers in Ada County, Idaho. The center dispatches units for the Ada County Emergency Medical Services, three police departments, seven fire departments/districts and the Ada County Sheriff's Office. The cost of migration to an entirely new narrowband radio system could cause a severe economic impact on the Ada County Sheriff's Office and all public safety service providers in Ada County.

The state capitol, Boise, resides in Ada County. Our communications system incorporates the largest dispatch center in the state. Ada County is a low density population area with a low tax base. This makes it extremely hard to replace the public safety radio system in Ada County.

The decrease in the coverage area due to power limitations based on the HAAT (height above average terrain) and ERP (effective radiated power) is of great concern. These two requirements could cause the public safety providers in Ada County to increase the existing fixed sites by as much as a factor of five times. The terrain in the county varies from a very deep

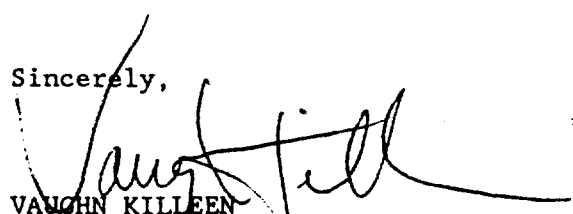
Office of the Secretary  
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Page 2

canyon (Snake River) in the south, across relatively flat lands in the middle of the county, to mountainous terrain in the north and east.

No plan has been brought forward as how to make a smooth transition from the equipment we have now to the equipment we will be compelled to buy in order to comply with these rules. Also, I know of no manufacturer with radio equipment on the market today which can satisfy the narrowband requirements as written in PR Docket No. 92-235.

I join with the Associated Public Safety Communications Officers, Inc. in opposing PR Docket No. 92-235. I look forward to your reply and if you have any questions or desire any further information, please contact me at your convenience.

Sincerely,



VAUGHN KILLEEN  
Ada County Sheriff

VK/bg

cc: Senator Craig  
Senator Kempthorne  
Congressman LaRocco ✓  
Congressman Crapo